

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK**

<hr/>	:	Case No. 1-19-42688-ced
In re:		
	:	
Renee Maslikhov aka Renee Butler		Chapter 11
	:	
Debtor(s).	:	Hearing Date: August 28, 2019 at 2:00pm
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OPPOSITION TO DEBTOR’S MOTION TO EXTEND EXCLUSIVITY PERIODS

Standard Oil Credit Holding Group, LLC (“Standard Oil”), by and through the undersigned counsel, opposes the Debtor’s Motion to Extend Exclusivity Periods (“Debtor’s Motion”), and asserts as follows:

1. In theory, Standard Oil does not object to the extension of the Exclusivity Periods, however, no post-petition payments have been made to Standard Oil, and limited progress has been made on the sale of the Property referenced in the Debtor’s Motion.

2. The Debtor’s Motion references a pending sale of the Debtor’s Property, located at 328 Jefferson Avenue, Brooklyn, NY 11216 (“Property”), highlighting the pending adversary proceeding, the existence of a signed contract and funds currently held in escrow. *See* Docket No. 33, Pg. 6-7.

3. No motion to sell the Property pursuant to 11 U.S.C. §363 has been filed on the bankruptcy docket, indicating that the sale is not as imminent as the Debtor represents.

4. Additionally, no post-petition mortgage payments have been made to Standard Oil.

5. As noted in the Debtor’s Motion, one of the factors considered by the Court is “the fact that the debtor is paying its bills as they become due.” *In re Adelphia Commc’ns Corp.*, 352 B.R. 578, 587 (Bankr. S.D.N.Y. 2006). The Debtor is not paying its bills as they come due.

6. Standard Oil objects to the Debtor's Motion, and respectfully contends that the Debtor must come current on its post-petition obligations before the requested relief may be granted.

NORGAARD, O'BOYLE & HANNON
Attorneys for Secured Creditor, Standard Oil Credit Holding Group, LLC

Dated: 8/20/19

By /s/ *Brian Hannon, Esq.*
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